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FILED

APR 21 2022

U.S. MAGISTRATE JUDGE

BY _____

7
8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 MICHAEL OVERTON, and
13 CHRISTINE SCHULTZ,

14 Defendants.

COMPLAINT

Magistrate No.

2:22-MJ- 302 -VCF

VIOLATION:

18 U.S.C. § 1073(1) – *Unlawful Flight to
Avoid Prosecution*

(Filed Under Seal)

15 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
16 Complainant, being duly sworn, deposes and states:

17 **Count One**

(Unlawful Flight to Avoid Prosecution)

18 On or about April 21, 2022, in the State and Federal district of Nevada,
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20 **MICHAEL OVERTON, and
CHRISTINE SCHULTZ,**

21 defendants herein, did move or travel in interstate and foreign commerce with intent to
22 avoid prosecution, or custody or confinement after conviction, under the laws of the State
23 of Nevada, for a crime, which is a felony under the laws of the State of Nevada, to wit:
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1 open murder, in violation of NRS 200.010, robbery with a deadly weapon in violation of
2 NRS 200.380, and kidnapping in violation of NRS 200.310.

3 1. Your Complainant is a Special Agent with the FBI currently assigned to the
4 Las Vegas, Nevada Division and has been so employed for over 13 years. Prior to this he
5 was employed for over five years as a Deputy Sheriff and Detective with the Orange
6 County Sheriff's Office (Florida). As an FBI Agent, your Complainant is assigned to the
7 FBI's Criminal Apprehension Team (CATs) and is responsible for investigating a variety
8 of violent crimes, to include: bank robbery, kidnapping, extortion, commercial robbery,
9 carjackings, assaults and murders of federal officers, racketeering related violent offenses,
10 mass shooting incidents and violent crimes occurring in public places, as well as domestic
11 and international fugitive matters. Your Complainant has experience in conducting
12 criminal investigations, including the investigation of criminal groups and conspiracies as
13 well as the collection of evidence and the identification and use of witnesses.

14 2. Your Complainant respectfully submits that this affidavit establishes
15 probable cause in support of the issuance of a Criminal Complaint and Arrest warrant for
16 Michael Overton and Christine Schultz (hereinafter referred to as "Overton" and
17 "Schultz") for Unlawful Flight to Avoid Prosecution in violation of 18 U.S.C. § 1073(1).
18 The information contained herein is based on your Complainant's personal knowledge of
19 the investigation, information provided to him by other law enforcement officers and his
20 review documents and reports prepared by other law enforcement agencies in connection
21 with the investigation of this case. This affidavit is submitted solely to establish probable
22 cause in support of this Criminal Complaint and Arrest Warrant; it does not contain all
23 information known to your Complainant regarding this matter. All times noted are
24 approximate.

FACTS ESTABLISHING PROBABLE CAUSE

3. On March 25, 2022, officers with the Las Vegas Metropolitan Police Department (LVMPD) responded to a report of a shooting and vehicle crash in the area of 6490 Bright Nimbus Avenue, Las Vegas. *See* LVMPD Event No. LLV220300103498. Upon arriving, officers learned that three black male adults and an Asian female adult had committed a home invasion at 6490 Bright Nimbus Avenue. During the course of this home invasion, the assailants and one of the residents exchanged gunfire resulting in the death of the residence (hereinafter referred to as "N.M."). After the assailants fled, another resident was arriving home and chased one of the black males as he attempted to escape in a vehicle. This vehicle crashed into a nearby wall, and the driver fled on foot.

4. LVMPD homicide detectives assumed the investigation and learned that the Asian female suspect was known to the victims. Through additional follow-up investigation this woman was identified Christine Schultz. The vehicle that had crashed and been abandoned by one of the male suspects was found to be registered to Michael Overton. Additional investigation led to Overton being identified as one of the participants in the home invasion. Evidence collected at the crime scenes indicated that Overton was likely injured during the exchange of gunfire with N.M.

5. On April 1, 2022, the FBI's Criminal Apprehension Team (CATs) task force attempted to locate Overton and Schultz after learning they may be staying at a Las Vegas area motel. CATs personnel learned that Overton and Schultz left the room early on the morning of April 1 in a taxicab. They were observed on surveillance footage carrying large bags. The taxicab transported them to the Regional Transportation Center (RTC) terminal on Sunset Road, where they boarded a Greyhound bus at approximately 7:00 a.m.

1 6. Greyhound was unable to provide the itinerary for Overton and Schultz'
2 travel. Court authorized tracking of a cellular telephone associated to Overton revealed
3 that the phone was generally powered off, but intermittent geo-location information
4 indicated that it was travelling east. The final geo-location for this telephone before it
5 powered off for the final time was on April 3, in the area of Tallahassee, Florida. A review
6 of historical records for this telephone revealed several calls to Jacksonville, Florida area
7 code telephone numbers. On this basis, your Complainant and all officers cognizant of
8 this investigation have a reasonable belief that Overton and Schultz are currently hiding in
9 the area Jacksonville, Florida.

10 7. On March 28, 2022, arrest warrants were issued in Las Vegas Justice Court
11 charging Michael Overton and Christine Schultz with open murder, robbery with a deadly
12 weapon, and kidnapping, all in violation of Nevada Revised Statutes. The arrest warrants
13 were authorized by Justice of the Peace Harmony Letizia, Las Vegas Township Justice
14 Court. *See* Court Case No. 22-CR-014143.

15 8. The LVMPD has requested the FBI's assistance in locating and arresting
16 Michael Overton and Christine Schultz pursuant to the arrest warrants issued in their
17 jurisdiction. In addition, LVMPD has confirmed that they will seek to extradite Overton
18 and Schultz if they are located and arrested outside of their jurisdiction.

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CONCLUSION

9. Based on the above facts and circumstances, your Complainant believes there is probable cause that the defendants, Michael Overton and Christine Schultz have fled the State of Nevada in order to avoid arrest and prosecution for the criminal offenses of open murder, robbery with a deadly weapon and kidnapping, which are felony offenses in violation of Nevada Revised Statutes; all in violation of 18 U.S.C. § 1073(1): Unlawful Flight to Avoid Prosecution.

Respectfully submitted,



Christopher W. McPeak, Special Agent
Federal Bureau of Investigation

Attested to by the complainant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 21st day of, April 2022.



HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE